UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 10
1200 Sixth Avenue
Seattle, Washington 98101

January 29, 1999

Ms. Carol Hathaway
U.S. Department of Energy
Idaho Operations Office
850 Energy Drive
Idaho Falls, Idaho 83401

Re: Comments on the Draft Final Remedial Investigation/Feasibility Study or the Central Facility Area, Operable Unit 4-13, at INEEL

Dear Carol,

Here are my comments on the responses to two EPA comments which are provided in Appendix M of the draft final WAG 4 RI/FS report:

1) Response to Comment #6. I had requested that soil washing be reevaluated to determine if it there are technical or economic reasons for screening it out. Soil washing has been shown to be ineffective in removing Cs-137 from INEEL soils. However, it is still viable for the mercury and lead contaminated soils. To justify screening out soil washing for mercury and lead, references should be cited in the literature showing that it is not effective on these metals. If this technology cannot be screened for mercury and lead, it should be retained for CFA-04 and CFA-10 in one of the final alternatives for detailed evaluation in Chapter 12 of the RI/FS.

2) Responses to comments 8, 14, and 18. These comments address the need for treatment of the RCRA wastes at CFA-04 and CFA-10 for Alternatives 3a and 3b. These alternatives have now been revised to include removal of contaminated soil at CFA-08 only. Although institutional controls and 5-year reviews have been added for any residual contamination at CFA-04 and CFA-08, these alternatives no longer appear to be comprehensive alternatives because they do include removal actions at CFA-04 and CFA-10. It appears that all soil contamination at CFA-04 and CFA-10 is expected to be removed but these removal actions are not part of alternative 3a and 3b. Under what alternative would removal of wastes at CFA-04 and CFA-10 occur?

Please contact me if you would like to discuss these comments.

Sincerely,

Keith A. Rose
INEEL WAG Manager

cc: Clyde Cody, IDEQ